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AIRWIRE TECHNOLOGIES, DEBASHIS BAGCHI,

AND JON BENGTON

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

ANUBHAV SINGH OBEROI,

Plaintiff,

vs.

AIRWIRE TECHNOLOGIES, JON
BENGTON, DEBASHIS BAGCHI, and
DOES 1 through 20, inclusive,

Defendants.

CASE NO. 5:20-cv-00753-SVK

**STIPULATION AND ~~[PROPOSED]~~
ORDER FOR AN EXTENSION OF TIME
TO FILE AN INITIAL PLEADING**

Defendants, AirWire Technologies, Jon Bengton and Debashis Bagchi (collectively “Defendants”) by and through their local California counsel, Joseph R. Lordan and Robert I. Lockwood of Lewis Brisbois Bisgaard & Smith LLP, and the plaintiff, Anubhav Singh Oberoi, by and through his counsel of record, Chaya M. Mandelbaum Esq. of Rudy, Exelrod, Zieff & Lowe, LLP, do hereby stipulate and agree as follows:

1. Plaintiff filed his Complaint on January 21, 2020.
2. On February 6, 2020, plaintiff served AirWire Technologies via their registered agent in California.
3. On February 10, 2020, the Complaint was emailed to Defendants’ Nevada counsel, Pete Cladianos III, Esq. and Charles R. Zeh, Esq. of The Law Offices of Charles R. Zeh, Esq.

1 (“Nevada counsel”).

2 4. On February 12, 2020, Nevada counsel for AirWire Technologies and the
3 individual defendants agreed to accept service for its clients and requested an extension until
4 March 10, 2020, for its initial pleading.

5 5. Defendants and their Nevada attorneys required additional time to respond to the
6 Complaint as the result of a heavy litigation schedule, other commitments and the need to
7 associate with California counsel. Additionally, the burden of the state and local government
8 reaction to the COVID-19 virus has made responding to the Complaint all the more complex.
9 Correspondingly, the Nevada attorneys for the Defendants requested an additional 21 days to
10 provide their initial pleadings. This makes the initial pleading due on or before March 31, 2020.

11 6. The Parties hereby agree and stipulate to the date of March 31, 2020, as the
12 deadline for the filing of initial pleadings of AirWire Technologies, Debashis Bagchi and Jon
13 Bengtson.

14 7. This extension will not impact any other deadlines or any dates set by the Court.

15 **ECF ATTESTATION**

16 Pursuant to Civil L.R. 5-1(i)(3), the filer attests that concurrence in the filing of this
17 document has been obtained from each of the other signatories thereto.

18 DATED: March 20, 2020

LEWIS BRISBOIS BISGAARD & SMITH LLP

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20 By: /s/ Robert I. Lockwood

Joseph R. Lordan

Robert I. Lockwood

Attorneys for Defendants AIRWIRE

TECHNOLOGIES, DEBASHIS BAGCHI, AND

JON BENGTON

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1 DATED: March 20, 2020

RUDY, EXELROD, ZIEFF & LOWE LLP

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3 By: /s/ Chaya M. Mandelbaum, Esq.

4 Chaya M. Mandelbaum


Attorneys for Plaintiff ANUBHAV SINGH

OBEROI

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6 **~~PROPOSED~~ ORDER**

7 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

8 DATED: March 20, 2020

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11 Susan van Keulen
12 U.S. Magistrate Judge
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